

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

vs.

EARL COOK, JR.

Defendant

NO. 1:18-CR-00248

(Honorable John E. Jones, III)

(Filed Electronically)

ORDER

AND NOW, this ____ day of _____, 2018, upon consideration of the Defendant's Motion to Modify One Bail Condition, it is ORDERED that the motion is _____. Defendant shall be able to leave the Middle District to travel to Lancaster County for the purposes set forth in this Motion. No overnight in Lancaster.

All other aspects of the Defendant's supervision shall remain in full force and effect.

BY THE COURT,

J.

Distribution List: Attorney Herbert Corky Goldstein, 105 N. Front St., Ste. 205, Harrisburg, PA 17101
US Attorney James T. Clancy, 228 Walnut St., Ste. 217, P.O. Box 11754, Harrisburg, PA 17108
Daniel M. Karhnak, 228 Walnut St., Rm. 720, P.O. Box 805, Harrisburg, PA 17108

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(Honorable John E. Jones, III)

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Defendant.

MOTION TO MODIFY ONE BAIL & CONDITION

AND NOW, comes the Defendant, Earl Cook, Jr., by and through his attorneys, Mooney and Associates, by Attorney Herbert Corky Goldstein, and files this Motion to Modify One Bail Condition, whereof the following is a statement, to wit:

1. Defendant is Earl Cook, Jr., an adult individual, residing at 1245 Miller Drive, York, York County, PA, 17402, with his wife.
2. On August 16, 2018 this Honorable Court issued an Order setting forth the conditions of the Defendant's Release that included requiring the Defendant to remain in the Middle District of Pennsylvania (f. Travel only within MDPA).
3. The Defendant has been in full compliance with the conditions set forth in the August 16, 2018 Order.
4. The Defendant needs to travel at times to Lancaster County for his work, take his wife shopping for food and essentials, the vet for their dogs is in Lancaster County, they are members of BJ's Wholesale Club in Lancaster County, and their automobile is serviced in Lancaster County (Toyota).

5. Defendant is not a flight risk and has appeared at every required Court appearance and voluntary treatment for three years “prior” to his arrest and guilty plea.

6. Defendant has no criminal arrests on his record prior to this arrest or since this arrest. Defendant has waited three years to be arrested, after a search of his home.

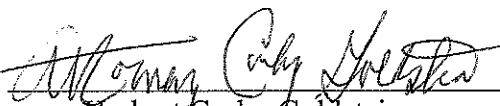
7. Defendant has also abided by the subsequent Order to be placed on a leg monitor, and a curfew. This subsequent Order was put in place, not because of any violation of the Order on August 16, 2018, by the Defendant.

8. It is indicated to the Defendant’s Counsel that the U.S. Attorney concurs.

WHEREFORE, Defendant respectfully requests this Honorable Court to modify his bail condition to remove the “one” requirement, not to travel outside of the Middle District of Pennsylvania.

Respectfully submitted,

MOONEY & ASSOCIATES

By: 
Attorney Herbert Corky Goldstein
Attorney for Defendant
I.D. # 7182
105 North Front Street
Harrisburg, PA, 17101
(717) 991-5919


CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Motion to Modify Bail Conditions on opposing counsel by electronically filing as follows:

James T. Clancy, Esquire
United States Attorney's Office
Ronald Reagan Federal Building
228 Walnut Street, Suite 220
P.O. Box 11754
Harrisburg, PA 17108-1754

Respectfully submitted,

MOONEY & ASSOCIATES

By: 
Attorney Herbert Corky Goldstein
Attorney for Defendant
I.D. # 7182
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CERTIFICATE OF CONCURRENCE

I, Attorney Herbert Corky Goldstein, hereby certify that I have contacted United States Attorney James T. Clancy, Esquire, regarding this Motion herein, and Attorney Clancy has indicated a concurrence to the Motion to Modify Bail Conditions.



Attorney Herbert Corky Goldstein
Attorney for Defendant

I.D. # 7182

105 North Front Street

Harrisburg, PA, 17101

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